

**FILED**

JAN 19 2012

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**MARK DEE GRAGG,**

**Defendant.**

No. *12-mj-13-TLW*

**COMPLAINT**

**[18 U.S.C. § 871(a): Threats**

**against the President and**

**18 U.S.C. § 879: Threats against**

**former Presidents and certain**

**other persons]**

BEFORE: T. Lane Wilson, United States Magistrate  
United States Courthouse, Tulsa, Oklahoma

The undersigned complainant being duly sworn states:

Beginning on or about October 1, 2011 and continuing until on or about December 16, 2011, in the Northern District of Oklahoma, the defendant, **MARK DEE GRAGG**, did knowingly and intentionally threaten to take the life of, and to inflict bodily harm upon the President of the United States and a member of the immediate family of the President, in violation of Title 18, United States Code, Sections 871(a) and 879.

The complainant further states that this Complaint is based on the attached Affidavit.

  
\_\_\_\_\_  
ROY WARD

United States Secret Service

Subscribed and sworn to before me, this *19<sup>th</sup>* day of January, 2012.

  
\_\_\_\_\_  
T. LANE WILSON

United States Magistrate Judge

## **AFFIDAVIT FOR COMPLAINT**

I, Roy A. Ward, being duly sworn, depose and state that I am a Special Agent with the United States Secret Service (U.S.S.S.), and have been so employed since April of 1999. I am a graduate of the Federal Law Enforcement Training Center and the United States Secret Service Rowley Training Center in Beltsville, Maryland. Currently, I am assigned to the United States Secret Service Tulsa Resident Office and one of my primary responsibilities is the investigation of threats made against the President of the United States.

As a result of my training and experience as a Secret Service Special Agent, I am familiar with Federal criminal laws and know that it is a violation of Title 18, United States Code, Sections 871 and 879, for any person to knowingly and willfully threaten the President of the United States or to knowingly willfully threaten a member of the immediate family of the President.

Further, your Affiant states as follows:

1. On Thursday, December 15, 2011, the Tulsa Resident Office of the United States Secret Service received a telephone message at 9:26 p.m. in which the caller stated that he wanted someone to shoot and kill the First Lady of the United States. Additionally, the caller stated that he would be willing to pay the sum of \$500 for that person to harm the First Lady of the United States.

2. On Friday, December 16, 2011, the Tulsa Resident Office of the United States Secret Service again received a telephone message at 2:02 a.m. in which the same caller left a message addressed to "Mr. Dead Fucking President" and described graphic acts of physical violence and harm befalling the First Lady of the United States.

3. Both the call received on December 15, 2011, and December 16, 2011, were initiated by the same telephone number, specifically 918-629-8771. Subsequent investigation conducted by

the United States Secret Service revealed that the account holder for this telephone number is MARK DEE GRAGG.

4. The Special Agents in the Tulsa Resident Office of the United States Secret Service are familiar with MARK DEE GRAGG as someone who has previously called their office and threatened the President of the United States. In previous telephone conversations, MARK DEE GRAGG identified himself to federal agents.

5. Beginning in or about October, 2011, MARK DEE GRAGG, initiated numerous after-hours telephone calls to the United States Secret Service. In these calls MARK DEE GRAGG, continually threatened the President of the United States. Specifically, MARK DEE GRAGG, threatened to “stick my gun up your dead fucking nigger president’s ass.” In numerous other telephone messages MARK DEE GRAGG continually referred to the President of the United States as “your dead fucking nigger president.”

6. Due to the threats previously made against the President of the United States and the First Lady of the United States, the United States Secret Service began an investigation into MARK DEE GRAGG and actively sought him for interview. Due to his lack of physical address and transient nature, he was not located until January 18, 2012.

7. On January 18, 2012, MARK DEE GRAGG was discovered by the Tulsa Police Department parked in his vehicle adjacent to an abandoned building located at 1800 South Cheyenne, Tulsa, Oklahoma. The Tulsa Police Department alerted the United States Secret Service and I responded to the scene.

8. After having been advised of his *Miranda* rights, MARK DEE GRAGG agreed to waive his rights and speak to agents of the United States Secret Service.

9. During the interview, MARK DEE GRAGG admitted to federal agents that he had made the calls in which he threatened the President of the United States and the First Lady of the United States. Additionally, when asked if he meant to do harm to the President and the First Lady of the United States, MARK DEE GRAGG told federal agents that if he didn't get what he wanted he "might be at liberty to force a situation."

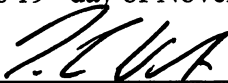
10. All of these events took place within the Northern District of Oklahoma.

Based upon the above information, I conclude that there is probable cause to believe that MARK DEE GRAGG committed a violation of Title 18, United States Code, Sections 871 and 879 and shall so be brought forth to answer such charges.

FURTHER THE AFFIANT SAITH NOT.

  
\_\_\_\_\_  
ROY A. WARD  
Special Agent, United States Secret Service

Sworn to and subscribed before me this 19<sup>th</sup> day of November, 2011.

  
\_\_\_\_\_  
T. LANE WILSON  
United States Magistrate Judge